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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

18 Master File No.: 4:07-cv-05944-JST
19 Case No. 4:13-cv-03234-JST

20 MDL No. 1917

21 This Document Relates to:
22 All Indirect Purchaser Actions

23 **DECLARATION OF LAUREN C.**
24 **CAPURRO IN SUPPORT OF**
25 **INDIRECT PURCHASER**
26 **PLAINTIFFS' ADMINISTRATIVE**
27 **MOTION TO FILE DOCUMENTS**
28 **UNDER SEAL PURSUANT TO CIVIL**
29 **LOCAL RULES 7-11 AND 79-5(d)**

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am a partner at the law firm Trump, Alioto, Trump & Prescott,
4 LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) in
5 the above-captioned action.

6 2. I make this declaration in support of the IPPs’ Administrative Motion to
7 File Under Seal Pursuant to Civ. L. R. 7-11 and 79-5(d). The matters set forth herein are
8 within my personal knowledge and if called upon and sworn as a witness I could
9 competently testify regarding them.

10 3. I have reviewed and complied with this Court’s Standing Order Governing
11 Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar,
12 dated March 19, 2019.

13 4. I have reviewed and complied with Civil Local Rule 79-5.

14 5. On June 18, 2008, the Court approved a “Stipulated Protective Order” in
15 this matter (ECF No. 306, amended at ECF No. 1142) (the “Protective Order”).

16 6. Section 10 of the Protective Order requires that “a Party may not file in the
17 public record in this action any Protected Material. A Party that seeks to file under seal
18 any Protected Material must comply with Civil Local Rule 79-5.”

19 7. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), IPPs
20 seek to file the gray highlighted portions of IPPs’ proposed Second Amended Class Action
21 Complaint Against Thomson and TDA Defendants under seal. The proposed redactions in
22 the Second Amended Class Action Complaint are identical to the redactions previously
23 ordered for the First Amended Class Action Complaint. *See* ECF No. 3882 (order granting
24 motion to file portions of First Amended Class Action Complaint under seal). IPPs have
25 maintained those allegations as confidential throughout this litigation.

26 8. The documents or portions of documents that IPPs seek to file under seal
27 contain either (a) material designated by certain Defendants pursuant to the Stipulated
28 Protective Order as “Confidential” or “Highly Confidential” or (b) analysis of, references

1 to, or information taken directly from material designated by certain Defendants pursuant
2 to the Stipulated Protective Order as “Confidential” or “Highly Confidential.”

3 9. The entities that have designated the materials referred to in the gray
4 highlighted portions of the proposed Second Amended Class Action Complaint as
5 confidential or highly confidential are: MT Picture Display Co., Ltd., Thomson SA (now
6 known as Technicolor SA), Thomson Consumer Electronics, Inc. (now known as
7 Technicolor USA, Inc.), Technologies Displays Americas, LLC, Chunghwa Picture Tubes,
8 Ltd., Samsung SDI Co., Ltd., Koninklijke Philips Electronics B.V., and Toshiba
9 Corporation.

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11 I declare under penalty of perjury under the laws of the United States that the
12 foregoing is true and correct. Executed this 13th day of September, 2019 at San Francisco,
13 California.

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/s/ Lauren C. Capurro
Lauren C. Capurro

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